

HERRERA PURDY LLP  
Shawn M. Kennedy (SBN 218472)  
skennedy@herrerapurdy.com  
Andrew M. Purdy (SBN 261912)  
apurdy@herrerapurdy.com  
Bret D. Hembd (SBN 272826)  
bhembd@herrerapurdy.com  
4590 MacArthur Blvd., Suite 500  
Newport Beach, CA 92660  
Tel: (949) 936-0900  
Fax: (855) 969-2050

HERRERA PURDY LLP  
Nicomedes Sy Herrera (SBN 275332)  
nherrera@herrerapurdy.com  
Laura E. Seidl (SBN 269891)  
lseidl@herrerapurdy.com  
1300 Clay Street, Suite 600  
Oakland, CA 94612  
Tel: (510) 422-4700  
Fax: (855) 969-2050

LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
Rachel Geman (*Pro Hac Vice*)  
rgeman@lchb.com  
Rhea Ghosh (*Pro Hac Vice*)  
rghosh@lchb.com  
250 Hudson Street, 8th Floor  
New York, NY 10013-1413  
Tel: (212) 355-9500  
Fax: (212) 355-9592

*Interim Co-Lead Class Counsel*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY  
LITIGATION

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
Michael W. Sobol (SBN 194857)  
msobol@lchb.com  
Melissa Gardner (SBN 289096)  
mgardner@lchb.com  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Tel: (415) 956-1000  
Fax: (415) 956-1008

BURNS CHAREST LLP  
Warren T. Burns (*Pro Hac Vice*)  
wburns@burnscharest.com  
Russell Herman (*Pro Hac Vice*)  
rherman@burnscharest.com  
900 Jackson Street, Suite 500  
Dallas, TX 75202  
Tel: (469) 904-4550  
Fax: (469) 444-5002

BURNS CHAREST LLP  
Christopher J. Cormier (*Pro Hac Vice*)  
ccormier@burnscharest.com  
4725 Wisconsin Avenue, NW, Suite 200  
Washington, DC 20016  
Tel: (202) 577-3977  
Fax: (469) 444-5002

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF RACHEL GEMAN  
IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO MOTION TO  
DISMISS**

Hon. Donna M. Ryu

Action Filed: May 4, 2020

Trial Date: None Set

1 I, Rachel Geman, declare and state as follows:

2 1. I am an attorney at Lieff Cabraser Heimann & Bernstein, LLP, counsel for the Plaintiffs  
3 and the proposed Classes in the above captioned litigation. I am a member in good standing of the State  
4 Bar of New York. I am older than 21 years of age and am not a party to this action. I make this  
5 declaration in support of Plaintiffs' Opposition to Defendant Plaid, Inc.'s Motion to Dismiss (Dkt. 78).  
6 If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Complaint in *Toronto-*  
8 *Dominion Bank v. Plaid Inc.*, No. 20-14424 (D.N.J.), filed October 14, 2020.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of Assembly Committee on  
10 Appropriations Bill Analysis regarding Senate Bill 355 (July 13, 2005).

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of Assembly Committee on  
12 Judiciary Bill Analysis regarding Senate Bill 355 (June 28, 2005).

13 5. Attached hereto as **Exhibit 4** is a true and correct copy of Senate Rules Committee Bill  
14 Analysis regarding Senate Bill 355 (August 25, 2005).

15 6. Attached hereto as **Exhibit 5** is a true and correct copy of Introduction of Senate Bill 355  
16 by Senator Murray (February 16, 2005).

17 7. Attached hereto as **Exhibit 6** is a true and correct copy of Assembly Committee on  
18 Business and Professions Bill Analysis regarding Senate Bill 355 (June 21, 2005).

19 8. Attached hereto as **Exhibit 7** is a true and correct copy of Senate Judiciary Committee  
20 Bill Analysis regarding Senate Bill 355 (April 5, 2005).

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th day  
22 of November, 2020, at New York, New York.

23  
24 /s/ Rachel Geman  
25 Rachel Geman  
26  
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